

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. 3:13-CR-91-B
	§	
TIMOTHY RINEHART	§	

**MOTION FOR DETENTION**

The United States moves for pretrial detention of defendant, Timothy Rinehart, pursuant to 18 U.S.C. §3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

- ☐ Crime of violence (18 U.S.C. §3156);
- ☐ Maximum sentence life imprisonment or death
- ☐ 10 + year drug offense
- ☐ Felony, with two prior convictions in above categories
- ☒ Serious risk defendant will flee
- ☐ Serious risk obstruction of justice
- ☒ Felony involving a minor victim
- ☐ Felony involving a firearm, destructive device, or any other dangerous weapon
- ☐ Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

  X   Defendant's appearance as required

  X   Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against defendant because (check one or both):

       Probable cause to believe defendant committed 10+ year drug offense  
or firearms offense, 18 U.S.C. §924(c)

       Probable cause to believe defendant committed a federal crime of  
terrorism, 18 U.S.C. §2332b(g)(5)

  X   Probable cause to believe defendant committed an offense involving  
a minor, 18 U.S.C. §§1201, 2251

       Previous conviction for "eligible" offense committed while on  
pretrial bond

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

       At first appearance

  X   After continuance of   3   days (not more than 3).

DATED this 29th day of March, 2013.

Respectfully submitted,

SARAH R. SALDAÑA  
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on counsel for the defendant in accordance with the Federal Rules of Criminal Procedure on this 29th day of March, 2013.

/s/ Brian Daniel Poe  
BRIAN DANIEL POE  
Assistant United States Attorney